



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL

FEB 16 2016

Mr. Paul Dolan
General Manager
SPS Technologies, LLC
301 Highland Ave
Jenkintown, PA 19046-2611

RE: SPS Technologies, LLC
EPA Docket No. CAA-III-016-0006

Dear Mr. Dolan:

On April 7th and October 13th of 2015, the U.S. Environmental Protection Agency (EPA) Region III Air Protection Division received the SPS Technologies, LLC facility's ("SPS Technologies" or the "Facility") 2014 Annual and 2015 Semi-Annual Title V Compliance Status Reports. This is a Notice of Noncompliance and Show Cause Notification relating to the above self-certification documents.

Based upon EPA's review of information relating to the Facility's Clean Air Act (CAA) compliance, EPA believes that the Facility failed to comply with certain federally enforceable requirements applicable to the Facility. A summary of the alleged CAA noncompliance is enclosed herein. See Enclosure A (General Summary of Allegations of Noncompliance with the Clean Air Act). EPA is interested in discussing the areas of noncompliance summarized in Enclosure A with SPS Technologies representatives.

REQUEST FOR INFORMATION & OPPORTUNITY TO CONFER

In order to initiate discussions regarding this matter, EPA is requesting an opportunity to confer with you and other representatives of the Facility. The purpose of such discussions would be to 1) discuss any additional information that SPS Technologies representatives may have demonstrating that EPA's summary of alleged violations set forth in Enclosure A is incorrect and 2) provide any additional information relevant to EPA's determination of whether EPA Region III should consider any potential enforcement action relating to the summary of allegations set forth in Enclosure A.

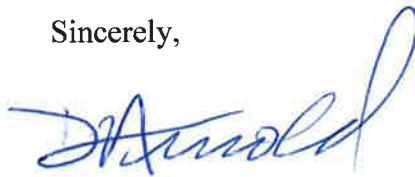
In order to expedite discussions of this matter, by this letter, EPA is requesting a timely response to this letter and submission of any additional information demonstrating that EPA's summary of alleged violations set forth in Enclosure A are not correct. Therefore, EPA is requesting that SPS Technologies representatives respond to this letter within fifteen (15) business days of receipt of this letter. The Agency may determine an appropriate enforcement response without further prior notice to you.

Please send any and all information responsive to the above request, and direct any request for a settlement conference, to the attention of:

Erin Malone
Physical Scientist
Air Protection Division (3AP20)
U.S. EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

We look forward to discussing this matter further SPS Technologies representatives. If you have any questions regarding anything in this letter, please contact Erin Malone at your earliest convenience at (215) 814-2190 or at malone.erin@epa.gov. Alternatively, in the event that SPS Technologies is represented by legal counsel, such legal counsel may contact Kathleen Root in EPA Region III's Office of Regional Counsel at (215) 814-2684 or at root.kathleen@epa.gov.

Sincerely,



David L. Arnold, Acting Director
Air Protection Division

Enclosure

Cc: James D. Rebarchak, AQ Program Manager- PADEP



Bcc: Erin Malone, Physical Scientist (3AP20)
Kathleen Root, Sr. Assistant Regional Counsel- US EPA (3RC10)



Enclosure A:
SPS Technologies

General Summary of Allegations of Noncompliance with the Clean Air Act

Site Level:

Title V Permit- Section C.; VI. Work Practice Requirements; Permit Condition #022; Page 22
(Referencing 40 C.F.R. Part 63, Subpart A- General Provisions)

1. SPS Technologies failed to maintain complete maintenance records as required by §63.6(e) for compliance with standards and maintenance requirements. These events of noncompliance occurred various times throughout 2014.

Source ID 30, Keeler Boiler:

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #011; Page 30
(Referencing 25 PA Code §127.441)

2. From January 2014 through February 2015, SPS Technologies failed to calculate and record the monthly and 12-month rolling fuel usage for the Keeler Boiler. That is a recordkeeping failure that occurred 14 times for a required recordkeeping operation.

Source ID 39, Cleaver Brooks Boiler:

Title V Permit- Section D.; I. Restrictions; Permit Condition #008; Page 40 (Referencing 25 PA Code §127.441)

3. For two months in 2014, SPS Technologies failed to calculate and track weekly the 12-month rolling sum of fuel usage for the Cleaver Brooks Boiler.

Title V Permit- Section D.; I. Restrictions; Permit Condition #018; Page 46 (Referencing 25 PA Code §127.441)

4. On “various” occasions throughout 2014, SPS Technologies failed to calculate the gas usage on a 12-month rolling sum for the Cleaver Brooks Boiler.

Source ID 100, Auto. Barrel Plating Line 2:

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition # 003; Page 55
(Referencing 25 PA Code §127.441)

5. SPS Technologies failed to keep daily records of the scrubbing liquor flow rate, the static pressure drop across the scrubber, and the pH of the scrubbing liquor for every weekend from January 2014 through the end of February 2015. The deviations occurred on scrubbing system C100 119 times over the reported period. Additionally, this system has scrubbing water flow rate, pressure drop, and scrubbing liquor pH requirements and without comprehensive monitoring the permittee cannot satisfactorily document compliance with those conditions (Permit Conditions #004; #006; #008).

Source ID 101, Auto. Rack Plating Line (Line 1):

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #005; Page 57
(Referencing 25 PA Code §127.441)

6. SPS Technologies failed to keep daily records of the scrubbing liquor flow rate, the static pressure drop across the scrubber, and the pH of the scrubbing liquor for every weekend from January 2014 through the end of February 2015. The deviations occurred on scrubbing system C100 119 times over the reported period. Additionally, this system has scrubbing water flow rate, pressure drop, and scrubbing liquor pH requirements and without comprehensive monitoring the permittee cannot satisfactorily document compliance with those conditions (Permit Conditions #008; #010; #011).

Source ID 110, Automatic Rack Plating Line (#3):

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #003; Page 59
(Referencing 25 PA Code §127.441)

7. SPS Technologies failed to keep daily records of the scrubbing liquor flow rate, the static pressure drop across the scrubber, and the pH of the scrubbing liquor for every weekend from January 2014 through the end of February 2015. The deviations occurred on scrubbing system C110 119 times over the reported period. Additionally, this system has scrubbing water flow rate and pressure drop requirements and without comprehensive monitoring the permittee cannot satisfactorily document compliance with those conditions (Permit Conditions #004; #006).

Source ID 120, Manual Rack Plating Lines (#4, #5, RSO):

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #003; Page 61
(Referencing 25 PA Code §127.441)

8. SPS Technologies failed to keep daily records of the scrubbing liquor flow rate, the static pressure drop across the scrubber, and the pH of the scrubbing liquor for every weekend from January 2014 through the end of February 2015. The deviations occurred on scrubbing system C120 119 times over the reported period. Additionally, this system has scrubbing water flow rate, pressure drop, and scrubbing liquor pH requirements and without comprehensive monitoring the permittee cannot satisfactorily document compliance with those conditions (Permit Conditions #004; #007; #008).

Source ID 130, Surface Treatment and Small Lots Plating:

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #005; Page 64
(Referencing 25 PA Code §127.441)

9. SPS Technologies failed to keep daily records of the scrubbing liquor flow rate, the static pressure drop across the scrubber, and the pH of the scrubbing liquor for every weekend

from January 2014 through the end of February 2015. The deviations occurred on scrubbing system C130 119 times over the reported period.

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #003; Page 63 (Referencing 25 PA Code §127.441)

10. SPS Technologies did not calculate and record monthly and 12-month rolling sums for each acid exhaust and non-acid exhaust pollutant. This occurred in January and February of 2015 as well as “various” occurrences throughout 2014. Furthermore, permit conditions #001 and #002 require that limits are not exceeded for particular air contaminants and without the monthly and 12-month rolling sums being conducted the permittee cannot confirm that the allowable limits were not exceeded.

Source ID 738, Diesel Fire Pump:

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #005; Page 82 (Referencing 25 PA Code §127.441)

11. For the calendar year of 2014, SPS Technologies failed to comply with the monthly requirements for calculating the 12-month rolling sums of the hours of operation as well as the 12-month rolling sum of fuels used by the Diesel Fire Pump.

Source ID 200, Surface Coating Operations:

Title V Permit- Section D.; VI. Work Practice Requirements; Permit Condition #009; Page 72 (Referencing 40 C.F.R. Part 63, Subpart GG and 25 PA Code §129.73)

12. SPS Technologies applied a coating with an excessive VOC content, according to Table II Allowable Content of VOCs in Aerospace Coatings, on various occasions throughout 2014.

Title V Permit- Section D.; IV. Recordkeeping Requirements; Permit Condition #003; Page 70 (Referencing 25 PA Code §127.441)

13. SPS Technologies failed to keep records of the pressure drop across the paint filters on a daily basis for six months in the semi-annual period from January through June of 2015.